

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

*Plaintiff,*

18 Civ. 8175 (ER)

– against –

ECF CASE

BARRY C. HONIG, ROBERT LADD,  
ELLIOT MAZA, BRIAN KELLER,  
JOHN H. FORD, GRQ CONSULTANTS, INC.,  
and HS CONTRARIAN INVESTMENTS, LLC,

*Defendants.*  
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**DEFENDANT’S NOTICE OF MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE, that upon the Memorandum of Law in Support of Defendant Robert Ladd’s (“Mr. Ladd”) Motion for Summary Judgment, the Declaration of Adam Ford in Support of Defendant’s Motion for Summary Judgment dated November 21, 2022, and all exhibits attached thereto, Defendant’s Local Rule 56.1 Statement of Undisputed Material Facts, and upon all the papers and proceedings had herein, Mr. Ladd will move this court, before the Honorable Edgardo Ramos, at the Daniel Patrick Moynihan United States Courthouse for the Southern District of New York located at 500 Pearl St., New York, NY 10007-1312 on a date and at a time to be designated by the Court, for an Order pursuant to Federal Rule of Civil Procedure 56 granting summary judgment to Mr. Ladd as to Counts 5, 6, 7, and 8 of the Second Amended Complaint.

Mr. Ladd hereby respectfully requests oral argument on their motion for summary judgment.

Dated: November 21, 2022  
New York, NY

Respectfully submitted,

FORD O'BRIEN LANDY LLP

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